

EXHIBIT 6

Nicholas Loaiza

From: Charlotte Lepic (via Alter-AI-TT list) <Alter-AI-TT@simplelists.susmangodfrey.com>
Sent: Friday, October 11, 2024 6:40 AM
To: OpenAIcopyrightlitigation.lwteam@lw.com; OpenAICopyright; KVPOAI@keker.com
Cc: Alter-TT (Alter-AI-TT@simplelists.susmangodfrey.com)
Subject: AG v OAI - models

EXTERNAL Email

Counsel,

The parties have an outstanding dispute about which models should be included in discovery. We understand that OpenAI has reached the following agreement with the NYT as to models that do not "underl[ie] ChatGPT." Please confirm that OpenAI is willing to enter into the same agreement with Plaintiffs.

- OpenAI will make available for inspection the training data for GPT, GPT-2, and GPT-3, as well as the GPT-2 and GPT-3 models.
- OpenAI will consider running search terms Plaintiffs propose regarding GPT, GPT-2, and GPT-3 and will not reject such terms solely because they relate to those models.
- OpenAI is not withholding documents that are otherwise discoverable and responsive solely on the basis that they relate to the models under discussion.
- OpenAI is planning to produce non-custodial documents related to GPT-2 and GPT-3, as it has for other models. Specifically, OpenAI plans to produce the following non-custodial documents related to GPT-2 and GPT-3: the model cards, README files, research papers, and announcements, including documents related to 'pre-training' and 'post-training,' such that OpenAI is intending to cover the entire training process. In other words, OpenAI is collecting and producing the same kinds of documents for these models as OpenAI agreed to collect and produce for the later models.

Kind regards,
Charlotte

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